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*Attorney for Defendant*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

Della Kamkoff, John Andrew, Kayla Birch, )  
Rose Carney, Tereresa Ferguson, )  
Zoya Jenkins, Troy Fender, )  
Rhonda Conover, Autumn Ellanna, and )  
Nataliia Moroz, on behalf of themselves, )  
and all those similarly situated, )

Plaintiffs, )

v. )

Heidi Hedberg, in her official capacity as )  
Commissioner of the Alaska Department of )  
Health, )

Defendant. )

Case No.: 3:23-cv-00044-SLG

**AFFIDAVIT OF COUNSEL IN SUPPORT OF UNOPPOSED MOTION FOR  
EXTENSION OF TIME**

STATE OF ALASKA )  
 ) ss  
FIRST JUDICIAL DISTRICT )

I, Lael A. Harrison, being first duly sworn upon oath, depose and say:

1. I am counsel of record for the defendant in this matter and competent to testify to the following matters.

2. I was traveling on a site visit with a different state agency client from May 30 through June 7, 2024. Between May 31 and June 6, I was off the grid with no access to email, and I had only limited email access on May 30 and June 7 while in travel status on the grid.

3. On May 28, 2024, I left instructions for my co-worker AAG Jeff Pickett to complete and file the brief in opposition to the plaintiffs' renewed motion for preliminary injunction in this matter on June 5, 2024, when I would be out of the office.

4. When I got access to my email on June 7, I saw that the brief had not been filed. I texted with Mr. Pickett who assured me that there had been a short delay, but it would be filed that day (June 7), and I didn't need to review anything.

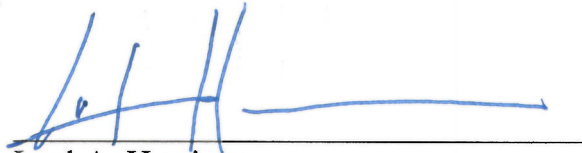
5. When I returned to my office this morning, I got the news that Mr. Pickett had been hospitalized over the weekend and had suffered some kind of major health crisis last week. I have not been able to speak to Mr. Pickett personally, but I understand his condition is still serious.

6. If Mr. Pickett completed a draft of the brief, I cannot find it on our internal storage drives. I am having to pick up work on the brief where I left off on May 28.

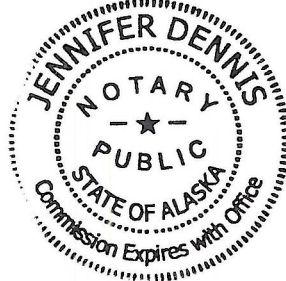
7. As Mr. Pickett represented to the Court in his filing last Thursday, June 6, 2024 [Dkt. 42], he did work with the Division of Public Assistance to obtain affidavits in support of the brief by the original filing date, and I was able to locate those documents.

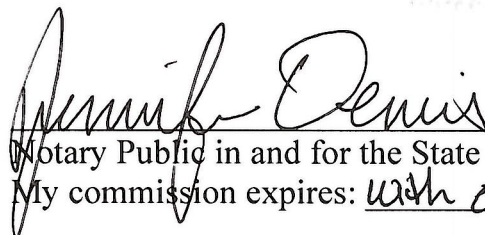
8. I have cleared my schedule for the next two days, with the exception of a short hearing tomorrow afternoon. I believe that if I focus exclusively on this brief for the next two days, it will be ready file on Wednesday, June 12, 2024.

9. This morning, I spoke to Mr. Feronti by telephone and sent an email to the plaintiffs' full legal team to inform them of this situation and request their position on an extension of time to file until Wednesday. I further provided them with a draft of this affidavit for their review. They informed me that, given these unusual circumstances, they do not oppose the motion.

  
Lael A. Harrison

SUBSCRIBED AND SWORN TO 6/10/2024 at Juneau, Alaska.



  
Notary Public in and for the State of Alaska  
My commission expires: with office